

Avram E. Frisch, Esq. (AF-0187)
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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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Devi Rajshri Sethumadhava Menon
Plaintiff

Civil Action No. 2:21-cv-08384-KM-
JBC

V.

REQUEST TO ENTER DEFAULT

Ward Corbett and Catalyst Partners

Defendants

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To the Clerk of the United States District Court for the District of New Jersey:

You will please enter the Default of the Defendants Ward Corbett and Catalyst Partners for failure to plead or otherwise defend as provided by Rule 12, of the Federal Rules of Civil Procedure as set forth in the Declaration of Avram E. Frisch, attorney for Plaintiff, attached hereto.

THE LAW OFFICE OF AVRAM E. FRISCH LLC
Attorney for plaintiff

By: /s/Avram E. Frisch

Dated: November 26, 2023

Avram E. Frisch, Esq.
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201-289-5352

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**DECLARATION OF AVRAM E.
FRISCH IN SUPPORT OF
PLAINTIFF'S REQUEST TO
ENTER DEFAULT AGAINST Ward
Corbett and Catalyst Partners**

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Avram E. Frisch, Esq of full age, hereby declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney at law licensed to practice in the State of New Jersey and admitted to practice before this Court, and I represent Plaintiff in the instant matter. I make this declaration in support of Plaintiff's Request to Enter Default against Defendants.
2. Pursuant to the Court's order of August 3, 2023 (ECF#17), I caused the service of the pleadings on defendants by alternative means.
3. In accordance with that order, I filed a declaration of service on September 15, 2023 (ECF #18).

4. The Defendants have failed to answer or otherwise respond to the Complaint.
5. Accordingly, Plaintiff respectfully requests that a default be entered by the Clerk against the Defendants.
6. declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 26, 2023.

/s/ Avram E. Frisch
Avram E. Frisch
Attorney for Plaintiff